

IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND

BRIAN A. MOKRICKY

*

Plaintiff

*

v.

*

Case No.: 10-C-17-002277

MYRA L. MOKRICKY

*

Defendant

*

* * * * *

RESPONSE TO MOTION TO DISMISS

Now Comes, the Respondent/Plaintiff, Brian A. Mokricky, by and through his attorney, Thomas P. Sinton, Esquire, and the Law Offices of Thomas P. Sinton, P.A., and in Response to the Motion to Dismiss, states as follows:

1. That the Respondent admits that he did file a Complaint for Absolute Divorce, on or about September 6th, 2017.
2. That the Defendant filed this Complaint for Absolute Divorce, *pro se*, that is, without the representation of an attorney.
3. That the Respondent admits that he filed the Complaint for Absolute Divorce, without filing a Financial Statement along with it. However, in further answer, he states that he filed the Complaint, without the benefit of Counsel, and was unaware that he needed to file the financial statement with it.
4. That upon being notified of the delinquency, the Respondent contacted the undersigned Counsel, and prepared a financial statement.
5. That the financial statement was filed simultaneously with the Response to the Motion to Dismiss.
6. That the Defendant has not suffered any prejudice by the delay associated with the Respondent's failure to file the financial statement.

WHEREFORE, the Respondent/Plaintiff requests:

- A. That the Motion to Dismiss be denied,
- B. That the Motion to Dismiss be deemed moot,
- C. That the relief requested be denied,
- D. For such other and further relief as the nature of his cause may require.



THOMAS P. SINTON, ESQUIRE
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301-694-8877
Attorney for Plaintiff/Respondent

I HEREBY CERTIFY that on the 4th day of December 2017, copies of the foregoing Response to Motion to Dismiss was mailed, first-class, postage prepaid to: Ms. Karen Robbins, Esquire, 129-12 W. Patrick Street, Frederick, MD 21701.



THOMAS P. SINTON, ESQUIRE